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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CODING TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	Case No.: 1:17-cv-23714
	§	
vs.	§	
	§	COMPLAINT
MERCEDES-BENZ USA, LLC,	§	
	§	INJUNCTIVE RELIEF DEMANDED
Defendant.	§	
	§	JURY TRIAL DEMANDED
	§	
	§	
	§	

Plaintiff, CODING TECHNOLOGIES, LLC, sues Defendant, MERCEDES-BENZ USA, LLC, and alleges as follows:

NATURE OF THE ACTION

1. This is an action for infringement of United States Patent No. 8,540,159 under the Patent Act, 35 U.S.C. § 271, *et seq.*, based on Defendant's unauthorized commercial manufacture, use, importation, offer for sale, and sale of infringing products and services in the United States.

PARTIES

2. Plaintiff, CODING TECHNOLOGIES, LLC, is a foreign limited liability company, organized under the laws of the State of Texas.

3. Defendant, MERCEDES-BENZ USA, LLC, is a foreign corporation with its

1 headquarters located in Atlanta, Georgia. Defendant uses, sells, and/or offers to sell products
2 and services in interstate commerce that infringe the '159 Patent.

3 **SUBJECT MATTER JURISDICTION**

4 4. This court has original jurisdiction over the subject matter of this action, pursuant
5 to 28 U.S.C. §§ 1331 and 1338(a), because this action involves a federal question relating to
6 patents.

7 **PERSONAL JURISDICTION**

8 5. The court has general *in personam* jurisdiction over Defendant because Defendant
9 is a citizen of the State of Florida and is found in this state.
10

11 **VENUE**

12 6. Venue is proper in this court, pursuant to 28 U.S.C. § 1400(b), because Defendant
13 has committed acts of infringement in this district and has a regular and established place of
14 business in this district.

15 **COUNT I**
16 **PATENT INFRINGEMENT**

17 7. Plaintiff repeats and re-alleges paragraphs 2 through 6 by reference, as if fully set
18 forth herein.

19 8. On September 24, 2013, the United States Patent & Trademark Office (USPTO)
20 duly and legally issued the '159 Patent, entitled "Method for Providing Mobile Service Using
21 Code Pattern." A true and authentic copy of the '159 Patent is attached hereto as **Exhibit "A"**
22 and incorporated herein by reference.

23 9. The '159 Patent teaches a method and apparatus for providing a mobile service
24 with the use of code pattern.

25 10. The '159 Patent is directed to computerized decoding technologies to provide

1 users with access to and use of various content more conveniently. Traditionally, companies
2 simply provided their URL information to the consuming public, but this is effective only if a
3 consumer memorized the name and spelling of the URL. Thus, there was a need in the art to
4 provide an effective product or method to assist consumers with recalling website or URL
5 information.

6 11. The '159 Patent claims, among other things, a method of providing content with
7 the use of code pattern by a user terminal; a user terminal for providing content with the use of
8 code pattern; a non-transitory machine-readable storage medium having encoded thereon
9 program code; and, a method of providing content with the use of an image captured by a user
10 terminal.

11 12. Collectively, the claimed embodiments in the '159 Patent provide new solutions
12 to problems related to transmitting information from a mobile service provider to a mobile
13 device.

14 13. The '159 Patent solves a problem with the art that is rooted in computer
15 technology that uses mobile service providers. The '159 Patent does not merely recite the
16 performance of some business practice known from the pre-Internet world along with the
17 requirement to perform it on the Internet.

18 14. Plaintiff is the assignee of the entire right, title, and interest in the '159 Patent at
19 the USPTO, including the right to assert causes of action arising under the '159 Patent.

20 15. Upon information and belief, Defendant has and continues to directly infringe,
21 contributorily infringe, or actively induce the infringement of the '159 Patent by making, using
22 (including by at least internally testing the Accused Products as defined herein), selling, offering
23 for sale, importing in the United States, including this judicial district, a user terminal designed
24
25

1 to capture certain code pattern information and convert same into embedded content, which
2 embodies or uses the invention claimed in the ‘159 Patent (the “Accused Products”), all in
3 violation of 35 U.S.C. § 271.

4 16. The Accused Products infringe at least claims 1, 2, 3, 4, 8, 9, 10, 11, 15, and 16 of
5 the ‘159 Patent.

6 *Claim 1*

7 17. Through claim 1, the ‘159 Patent claims a method of providing content with the
8 use of a code pattern by a user terminal, the method comprising: obtaining a photographic image
9 of a code pattern by a camera of the user terminal; processing, by a processor of the user
10 terminal, the photographic image of the code pattern to extract the code pattern from the
11 photographic image; decoding the extracted code pattern by the processor of the user terminal
12 into code information; transmitting a content information request message to a server based on
13 the code information; and receiving content information from the server in response to the
14 content information request message.
15

16 18. Defendant infringes claim 1.

17 19. Defendant, at least in internal use and testing, practices a method of providing
18 content (*e.g.*, a web page associated with the defendant) with the use of a code pattern (*e.g.*, a QR
19 code) by a user terminal (*e.g.*, a smartphone), as demonstrated in the following images:
20
21
22
23
24
25

To download a QR reader:

- Go to your device's app store and search for QR readers.
- Download the reader you prefer.

To scan the QR code within Mercedes-Benz vehicles:

- Open the QR reader app on your smartphone or tablet and find one of the two QR code decals located on the vehicle.
- Hold your device in front of the decal, press the button to scan, or wait until the reader focuses and takes you to the vehicle's schematic.



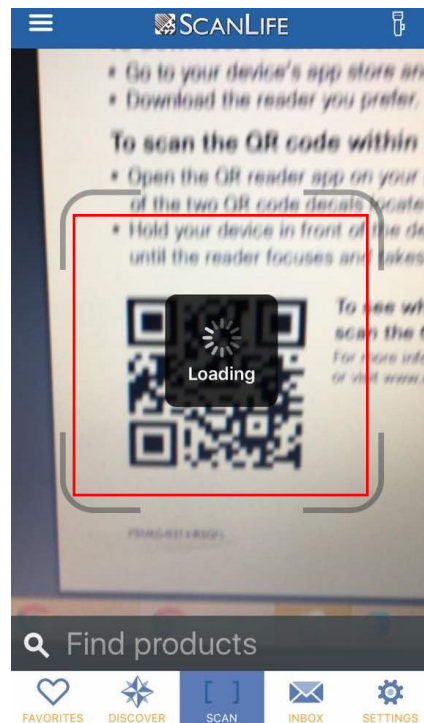
To see what a sample schematic looks like, scan the QR code here.

For more information, contact your dealership or visit www.mbusa.com/rescueassist.

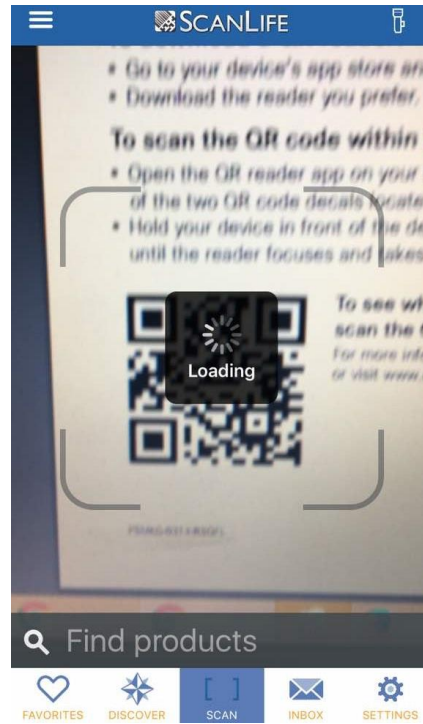
PSMKG-0314-RSQFL



Mercedes-Benz



20. Defendant, at least in internal use and testing, obtains a photographic image of a code pattern (e.g., QR code) by a camera of the user terminal (e.g., smartphone), as shown below:



21. Defendant, at least in internal use and testing, processes by a processor of the user terminal (*e.g.*, smartphone), the photographic image of the code pattern (*e.g.*, QR code) to view and extract the code pattern from the photographic image, as shown below:

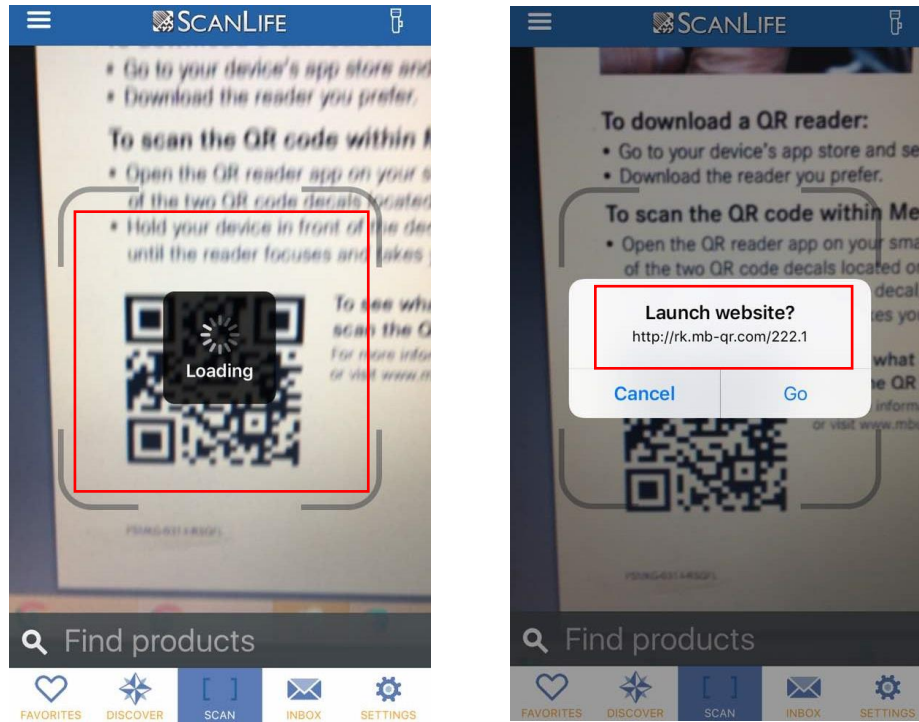
iPhone 7

Overview

Chip



A10 Fusion chip with 64-bit architecture
Embedded M10 motion coprocessor



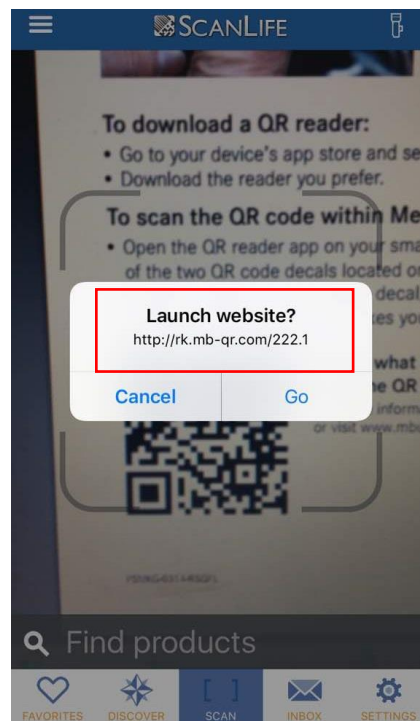
22. Defendant, at least in internal use and testing, decodes the extracted code pattern by the processor of the user terminal from the QR code into code information (e.g., URL of web page associated with the defendant), as shown below:



23. Defendant, at least in internal use and testing, transmits a content information request message (e.g., http request message for accessing the webpage associated with Defendant) to a server (e.g., Defendant's server) based on the code information (e.g., URL of the webpage associated with Defendant). Once the URL is decoded from the extracted QR code, a

request for accessing a webpage associated with Defendant is sent to Defendant's server.

24. Defendant, at least in internal use and testing, receives content information (e.g., a web page associated with Defendant) from the server (e.g., Defendant's server) in response to the content information request message (e.g., http request message for accessing the webpage associated with Defendant). As shown below, the terminal (e.g., smartphone) receives content information (e.g., webpage associated with Defendant).



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Claim 2

25. Through claim 2, the '159 Patent claims the method of claim 1, wherein the content information comprises at least one of the following: image, sound, moving picture, and text data.

26. Defendant infringes claim 2.

27. Defendant uses a user terminal to receive content information that comprises image and text data, as shown below:



Claim 3

28. Through claim 3, the '159 Patent claims the method of claim 1, wherein the transmitting a content information request message includes: extracting a uniform resource locator (URL) of the server from the code information; and transmitting the content information request message to the server based on the extracted URL.

29. Defendant infringes claim 3.

30. Defendant transmits a content information request message (*e.g.*, http request message for accessing the webpage associate with Defendant) which includes extracting URL of the server and transmitting the content information request message (*e.g.*, http request message for accessing the webpage associate with Defendant) to the server (*e.g.*, Defendant's server) based on the extracted URL.

Claim 4

31. Through claim 4, the '159 Patent claims the method of claim 1, wherein at the

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server, including: receiving the content information request message from the user terminal;
 extracting requested content information from a database based on the content information
 request message; and transmitting the extracted content information to the user terminal.

32. Defendant infringes claim 4.

33. Defendant, at least in internal use and testing, utilizes a server for receiving the
 content information request (*e.g.*, http GET request) from a user terminal (*e.g.*, smartphone). As
 shown below, a HTTP CONNECT request is sent from the user terminal to an intermediate
 system to access web page located at a certain URL. The intermediate system then transmits the
 received request to Defendant's web server.

Time	Source	Destination	Length	Protocol	Info
844 23.029977	192.168.1.103	192.168.1.100	66	TCP	49353 → 8888 [ACK] Seq=1 Ack=1 Win=131744 Len=0 TSval=499361046 TSecr=32127483
845 23.029978	192.168.1.103	192.168.1.100	523	HTTP	GET http://rk.mb-qr.com/222.1 HTTP/1.1
846 23.030724	fe80::f12b:3cb0::... fe80::4a3c:cff:f...		92	DNS	Standard query 0xb348 A rk.mb-qr.com
847 23.048674	192.168.1.100	192.168.1.103	66	TCP	8888 → 49352 [ACK] Seq=1 Ack=339 Win=17152 Len=0 TSval=32127487 TSecr=499361037
848 23.063286	fe80::4a3c:cff:f... fe80::f12b:3cb0::...		362	DNS	Standard query response 0x9442 A app.scanlife.com CNAME dualstack.slapps-700285247.us-east-1.elb.amazonaws.com A 54...
849 23.063755	192.168.1.100	54.235.177.168	66	TCP	63090 → 80 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
850 23.081764	192.168.1.100	192.168.1.103	66	TCP	8888 → 49353 [ACK] Seq=1 Ack=458 Win=17152 Len=0 TSval=32127490 TSecr=499361048
851 23.088563	52.0.168.29	192.168.1.100	54	TCP	443 → 63082 [ACK] Seq=5268 Ack=1329 Win=30464 Len=0
852 23.101617	52.0.168.29	192.168.1.100	1514	TCP	[TCP segment of a reassembled PDU]
853 23.103426	52.0.168.29	192.168.1.100	1514	TCP	[TCP segment of a reassembled PDU]
854 23.103469	192.168.1.100	52.0.168.29	54	TCP	63082 → 443 [ACK] Seq=1329 Ack=8188 Win=16384 Len=0
855 23.105240	52.0.168.29	192.168.1.100	1514	TCP	[TCP segment of a reassembled PDU]
856 23.105241	52.0.168.29	192.168.1.100	1514	TCP	[TCP segment of a reassembled PDU]
857 23.105260	192.168.1.100	52.0.168.29	54	TCP	63082 → 443 [ACK] Seq=1329 Ack=11108 Win=16384 Len=0
858 23.123969	192.168.1.100	192.168.1.1	72	DNS	Standard query 0xb348 A rk.mb-qr.com
859 23.159957	IntelCor_43:b9::...	Broadcast	42	ARP	Who has 192.168.1.5? Tell 192.168.1.100
860 23.421563	192.168.1.1	192.168.1.100	185	DNS	Standard query response 0xb348 A rk.mb-qr.com A 217.110.61.74 NS ns3.corpinter.net NS ns2.corpinter.de NS ns4.corpin...
861 23.421977	192.168.1.100	217.110.61.74	66	TCP	63091 → 80 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
862 23.433571	54.235.177.168	192.168.1.100	66	TCP	80 → 63090 [SYN, ACK] Seq=0 Ack=1 Win=14600 Len=0 MSS=1460 SACK_PERM=1 WS=256
863 23.433675	192.168.1.100	54.235.177.168	54	TCP	63090 → 80 [ACK] Seq=1 Ack=1 Win=16384 Len=0
864 23.433760	192.168.1.100	54.235.177.168	363	HTTP	GET /scans/code/likecount?barcodevalue=rk.mb-qr.com/222.1 HTTP/1.1
865 23.612218	192.168.1.100	192.168.1.103	1514	TCP	[TCP segment of a reassembled PDU]
866 23.612248	192.168.1.100	192.168.1.103	1514	TCP	[TCP segment of a reassembled PDU]
867 23.612265	192.168.1.100	192.168.1.103	1514	TCP	[TCP segment of a reassembled PDU]
868 23.612282	192.168.1.100	192.168.1.103	1514	TCP	[TCP segment of a reassembled PDU]
869 23.612297	192.168.1.100	192.168.1.103	114	TCP	[TCP segment of a reassembled PDU]
870 23.626400	217.110.61.74	192.168.1.100	66	TCP	80 → 63091 [SYN, ACK] Seq=0 Ack=1 Win=29200 Len=0 MSS=1460 SACK_PERM=1 WS=128
871 23.626490	192.168.1.100	217.110.61.74	54	TCP	63091 → 80 [ACK] Seq=1 Ack=1 Win=16384 Len=0
872 23.626664	192.168.1.100	217.110.61.74	486	HTTP	GET /222.1 HTTP/1.1
873 23.828454	192.168.1.103	192.168.1.100	66	TCP	49342 → 8888 [ACK] Seq=1509 Ack=8271 Win=128160 Len=0 TSval=499361751 TSecr=32127543
874 23.828455	192.168.1.103	192.168.1.100	66	TCP	[TCP Window Update] 49342 → 8888 [ACK] Seq=1509 Ack=8271 Win=131072 Len=0 TSval=499361751 TSecr=32127543
875 23.828455	192.168.1.103	192.168.1.100	66	TCP	49342 → 8888 [ACK] Seq=1509 Ack=11167 Win=129600 Len=0 TSval=499361751 TSecr=32127543
876 23.828456	192.168.1.103	192.168.1.100	66	TCP	49342 → 8888 [ACK] Seq=1509 Ack=11215 Win=129568 Len=0 TSval=499361751 TSecr=32127543

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```

1 GET http://rk.mb-qr.com/222.1 HTTP/1.1
2 Host: rk.mb-qr.com
3 X-NewRelic-ID: VQUPUFNBdHACUFdXDwgBXg==
4 Proxy-Connection: keep-alive
5 Upgrade-Insecure-Requests: 1
6 sl_webView: TRUE
7 Accept: text/html,application/xhtml+xml,application/xml;q=0.9,*/*;q=0.8
8 User-Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 10_3_2 like Mac OS X) AppleWebKit/603.2.4 (KHTML, like Gecko) Mobile/14F89
9 Accept-Language: en-us
10 Accept-Encoding: gzip, deflate
11 Connection: keep-alive

```

```

12 HTTP/1.1 302 FOUND
13 Date: Thu, 22 Jun 2017 10:56:18 GMT
14 Server: Apache
15 Vary: Accept-Language, Cookie
16 Content-Language: en
17 Location: http://rk.mb-qr.com/en/222.1/
18 X-Content-Type-Options: nosniff
19 X-Frame-Options: sameorigin
20 Content-Length: 0
21 Keep-Alive: timeout=5, max=100
22 Connection: Keep-Alive
23 Content-Type: text/html; charset=utf-8

```

34. Defendant, at least in internal use and testing, retrieves content (e.g., HTML content) on the basis of received request. As shown in images below the server seems to respond to the request with encrypted content.

```

13 GET http://rk.mb-qr.com/en/222.1/ HTTP/1.1
14 Host: rk.mb-qr.com
15 Accept: text/html,application/xhtml+xml,application/xml;q=0.9,*/*;q=0.8
16 Proxy-Connection: keep-alive
17 Upgrade-Insecure-Requests: 1
18 sl_webView: TRUE
19 If-Modified-Since: Thu, 22 Jun 2017 06:25:02 GMT
20 User-Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 10_3_2 like Mac OS X) AppleWebKit/603.2.4 (KHTML, like Gecko) Mobile/14F89
21 Accept-Language: en-us
22 Accept-Encoding: gzip, deflate
23 Connection: keep-alive

```

```

17 HTTP/1.1 200 OK
18 Date: Thu, 22 Jun 2017 10:56:18 GMT
19 Server: Apache
20 Content-Language: en
21 Content-Encoding: gzip
22 Expires: Thu, 22 Jun 2017 11:06:18 GMT
23 Vary: Accept-Language, Cookie, Accept-Encoding
24 Cache-Control: max-age=600
25 Content-Length: 1591
26 Last-Modified: Thu, 22 Jun 2017 10:56:18 GMT
27 X-Content-Type-Options: nosniff
28 X-Frame-Options: sameorigin
29 Keep-Alive: timeout=5, max=99
30 Connection: Keep-Alive
31 Content-Type: text/html; charset=utf-8

```

```

32 ...R.KY...Y[o.6.~..`S'h.R....6.4iQ...+vA P.....;mo.c;,[.....0,..[.....|...)..X...(..^..f...L..$.
33 .S.\.B8t...../(i.....jo...._wh.u...?{.zQ...a.3..S'.h..f$.2.@..\.q...j.Q...lh.J.9.o.8c.....;M4$...t...^..S..
34 04Nj.....C..C.....y..).....
35 %.40.....3.p..R.&..HO...x...y...9.T.L....\.. bh).....bj.k'T."S ...(.f. ...1#.....A.$K...^..6.s(.....g.....G.
36 2[D.pm.R9...15q...|f.<./..kn9. ....d3V.Z.....J.....k...qv.....t...hQ.g Y.....z.....R...T....
37 $......d.0@... .I.....i<.43.c6..
38 ...C...0...15..6b...b...*.Q...6=.....S.....;$...<...$2.. K..(7....L.[V[....c....a..m....[...^.....F9PC.T..P...
39 {...3...[...2IZ.ae...i"$......+.fv.`>.@z;[.89...Z.%.Zk'x..|.cC.....(.d#.H:&^..m...nP...TF.md...!.6".rZ0..Ec.]yec!
36

```

35. Defendant, at least in internal use and testing, utilizes a server for transmitting the content information (*e.g.*, HTML data) to the user terminal (*e.g.*, smartphone). As shown below, a response is sent from the server to an intermediate system. The intermediate system then transmits the received content to the user terminal.

Time	Source	Destination	Length	Protocol	Info
886 23.834153	192.168.1.103	192.168.1.100	66	TCP	49352 → 8888 [ACK] Seq=339 Ack=543 Win=131200 Len=0 TSval=499361854 TSecr=32127565
887 23.834153	192.168.1.103	192.168.1.100	66	TCP	49352 → 8888 [ACK] Seq=339 Ack=566 Win=131200 Len=0 TSval=499361854 TSecr=32127565
888 23.846337	217.110.61.74	192.168.1.100	54	TCP	80 → 63091 [ACK] Seq=1 Ack=433 Win=30336 Len=0
889 23.849694	217.110.61.74	192.168.1.100	399	HTTP	HTTP/1.1 302 FOUND
890 23.849870	192.168.1.100	192.168.1.103	411	HTTP	HTTP/1.1 302 FOUND
891 23.854066	192.168.1.103	192.168.1.100	66	TCP	49353 → 8888 [ACK] Seq=458 Ack=346 Win=131392 Len=0 TSval=499361873 TSecr=32127567
892 23.886092	192.168.1.103	192.168.1.100	536	HTTP	GET http://rk.mb-qr.com/en/222.1/ HTTP/1.1
893 23.886473	192.168.1.100	217.110.61.74	499	HTTP	GET /en/222.1/ HTTP/1.1
894 23.943058	192.168.1.100	192.168.1.103	66	TCP	8888 → 49353 [ACK] Seq=346 Ack=928 Win=16896 Len=0 TSval=32127576 TSecr=499361904
895 24.239456	217.110.61.74	192.168.1.100	54	TCP	80 → 63091 [ACK] Seq=346 Ack=878 Win=31360 Len=0
896 24.296421	52.0.168.29	192.168.1.100	990	TLSv1.2	Application Data
897 24.296515	192.168.1.100	192.168.1.103	1002	TLSv1.2	Application Data
898 24.346138	192.168.1.100	52.0.168.29	54	TCP	63082 → 443 [ACK] Seq=1329 Ack=12044 Win=15616 Len=0
899 24.477625	192.168.1.103	192.168.1.100	66	TCP	49342 → 8888 [ACK] Seq=1509 Ack=12151 Win=128640 Len=0 TSval=499362410 TSecr=32127612
900 24.477626	217.110.61.74	192.168.1.100	642	HTTP	[TCP Previous segment not captured] Continuation
901 24.477626	217.110.61.74	192.168.1.100	1514	TCP	[TCP Out-Of-Order] 80 → 63091 [ACK] Seq=346 Ack=878 Win=31360 Len=1460
902 24.477627	192.168.1.103	192.168.1.100	718	TLSv1.2	Application Data
903 24.477693	192.168.1.100	217.110.61.74	66	TCP	[TCP Dup ACK 893#1] 63091 → 80 [ACK] Seq=878 Ack=346 Win=16128 Len=0 SLE=1806 SRE=2394
904 24.477796	192.168.1.100	217.110.61.74	54	TCP	63091 → 80 [ACK] Seq=878 Ack=2394 Win=16384 Len=0
905 24.477895	192.168.1.100	52.0.168.29	706	TLSv1.2	Application Data
906 24.477909	192.168.1.100	192.168.1.103	523	TCP	[TCP segment of a reassembled PDU]
907 24.477971	192.168.1.100	192.168.1.103	1514	TCP	[TCP segment of a reassembled PDU]
908 24.477988	192.168.1.100	192.168.1.103	209	HTTP	HTTP/1.1 200 OK (text/html)
909 24.502608	192.168.1.103	192.168.1.100	66	TCP	49353 → 8888 [ACK] Seq=928 Ack=803 Win=130944 Len=0 TSval=499362519 TSecr=32127630

Claim 8

36. Through claim 8, the '159 Patent claims a user terminal for providing content with the use of a code pattern, the user terminal comprising: a camera configured to obtain a photographic image of a code pattern; a processor comprising: an image processor configured to process the photographic image of the code pattern to extract the code pattern from the photographic image; and a decoder configured to decode the extracted code pattern into code

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1 information; and a transceiver configured to (i) transmit a content information request message
2 to a server based on the code information; and (ii) receive content information from the server in
3 response to the content information request message.

4 37. Defendant infringes claim 8.

5 38. Defendant, at least in internal use and testing, uses a user terminal (*e.g.*,
6 smartphone) for providing content (*e.g.*, a web page associated with Defendant) with the use of a
7 code pattern (*e.g.*, QR code).

8 39. Defendant uses a user terminal comprising a camera configured to obtain a
9 photographic image of a code pattern (*e.g.*, QR code).

10 40. Defendant uses a user terminal comprising a processor which in turn comprises an
11 image processor configured to process the photographic image of the code pattern (*e.g.*, QR
12 code) to extract the code pattern (*e.g.*, QR code) from the photographic image. Once the
13 photographic image of the QR code is captured by the camera of the smartphone, the
14 photographic image is processed to retrieve the QR code. The retrieved QR code can be viewed
15 on the user interface screen of the smartphone.

16 41. Defendant uses a user terminal (*e.g.*, smartphone) comprising a decoder that is
17 configured to decode the extracted code pattern (*e.g.*, QR code) into code information (*e.g.*, URL
18 of web page associated with Defendant).

19 42. Defendant uses a user terminal comprising a transceiver (*e.g.*, FDD- LTE/TDD -
20 LTE/CDMA/EDGE transceiver) which is configured to transmit or receive a content
21 information request message (*e.g.*, http request message for accessing the webpage associated
22 with Defendant) to a server (*e.g.*, Defendant's server) based on the code information (*e.g.*, URL
23 of the webpage associated with Defendant). As shown below, once the URL is decoded from the
24
25

1 extracted QR code, a request or response for accessing a webpage associated with Defendant is
 2 sent to Defendant's server by means of transceiver of the smartphone:

3 iPhone 7

Overview iOS Tech Specs Buy

5 Cellular and 6 Wireless

Model A1660*
Model A1661*

FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 17, 18, 19, 20, 25, 26,
27, 28, 29, 30)

TD-LTE (Bands 38, 39, 40, 41)

TD-SCDMA 1900 (F), 2000 (A)

CDMA EV-DO Rev. A (800, 1900, 2100 MHz)

UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100
MHz)

GSM/EDGE (850, 900, 1800, 1900 MHz)

Model A1778*
Model A1784*

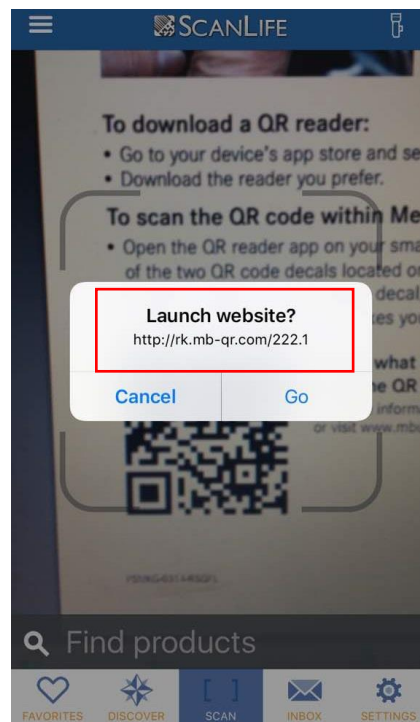
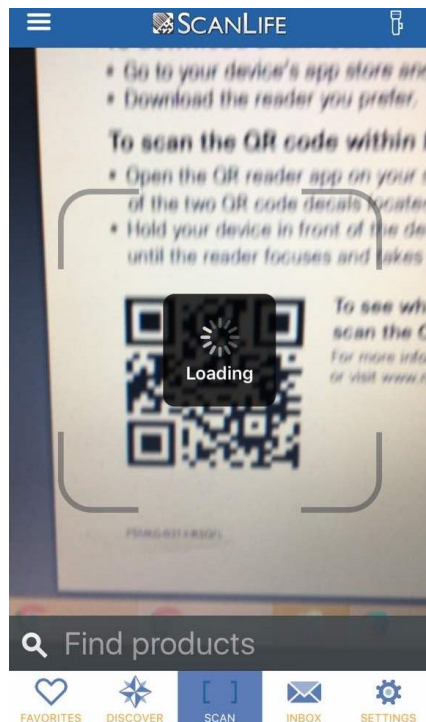
Models A1778 and A1784 do not
support CDMA networks, such as
those used by Verizon and Sprint.

FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 17, 18, 19, 20, 25, 26,
27, 28, 29, 30)

TD-LTE (Bands 38, 39, 40, 41)

UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100
MHz)

GSM/EDGE (850, 900, 1800, 1900 MHz)



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Claim 9

43. Through claim 9, the '159 Patent claims the user terminal of claim 8, wherein the content information comprises at least one of the following: image, sound, moving picture, and text data.

44. Defendant infringes claim 9.

45. Defendant uses a user terminal to receive content information that comprises image and text data.

Claim 10

46. Through claim 10, the '159 Patent claims the user terminal of claim 8, wherein: the processor is further configured to extract a uniform resource locator (URL) of the server from the code information; and the transceiver is further configured to transmit the content information request message to the server based on the extracted URL.

47. Defendant infringes claim 10.

48. Defendant uses a user terminal (*e.g.*, smartphone) that is configured to extract a uniform resource locator (URL) of the server (*e.g.*, Defendant's server) from the code information (*e.g.*, URL of web page associated with Defendant).

49. Defendant uses a user terminal (*e.g.*, smartphone) comprising a transceiver

1 configured to transmit the content information request message (*e.g.*, http request message for
2 accessing the webpage associate with Defendant) to the server (*e.g.*, Defendant's server) based
3 on the extracted URL.

4 ***Claim 11***

5 50. Through claim 11, the '159 Patent claims the user terminal of claim 8, wherein
6 the server is configured to receive the content information request message from the user
7 terminal; extract requested content information from a database based on the content information
8 request message; and transmit the extracted content information to the user terminal.

9 51. Defendant infringes claim 11.

10 52. Defendant, at least in internal use and testing, utilizes a server for receiving the
11 content information request (*e.g.*, http GET request) from a user terminal (*e.g.*, smartphone). A
12 HTTP CONNECT request is sent from a user terminal to an intermediate system to access a
13 certain web page. The intermediate system transmits the received request to Defendant's web
14 server.

15 53. Defendant, at least in internal use and testing, retrieves content (*e.g.*, HTML
16 content) on the basis of received request. Defendant's server then responds to the request with
17 encrypted content.

18 54. Defendant, at least in internal use and testing, utilizes a server for transmitting the
19 content information (*e.g.*, HTML data) to the user terminal (*e.g.*, smartphone). A response is
20 sent from the server to an intermediate system. The intermediate system then transmits the
21 received content to the user terminal.

22 ***Claim 15***

23 55. Through claim 15, the '159 Patent claims a non-transitory machine-readable
24
25

1 storage medium, having encoded thereon program code, wherein, when the program code is
2 executed by a machine, the machine implements a method for providing content with the use of a
3 code pattern by a user terminal, comprising the steps of: obtaining a photographic image of a
4 code pattern by a camera of the user terminal; processing, by a processor of the user terminal, the
5 photographic image of the code pattern to extract the code pattern from the photographic image;
6 decoding the extracted code pattern by the processor of the user terminal into code information;
7 transmitting a content information request message to a server based on the code information;
8 and receiving content information from the server in response to the content information request
9 message.
10

11 56. Defendant infringes claim 15.

12 57. Defendant, at least in internal use and testing, practices a method of providing
13 content (*e.g.*, a webpage associated with Defendant) with the use of a code pattern (*e.g.*, a QR
14 code) by a user terminal (*e.g.*, a smartphone).

15 58. Defendant, at least in internal use and testing, obtains a photographic image of a
16 code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*, smartphone).

17 59. Defendant, at least in internal use and testing, uses a processor of the user
18 terminal (*e.g.*, smartphone) to processes the photographic image of the code pattern (*e.g.*, QR
19 code) to extract the code pattern from the photographic image.

20 60. Defendant, at least in internal use and testing, decodes the extracted code pattern
21 by the processor of the user terminal into code information (*e.g.*, URL of web page associated
22 with Defendant).

23 61. Defendant, at least in internal use and testing, transmits and receives a content
24 information request message (*e.g.*, http request message for accessing the webpage associated
25

1 with Defendant) to and from a server (*e.g.*, Defendant's server) based on the code information
2 (*e.g.*, URL of the webpage associated with Defendant).

3 ***Claim 16***

4 62. Through claim 16, the '159 Patent claims a method of providing content with the
5 use of an image captured by a user terminal, the method comprising: obtaining a photographic
6 image by a camera of the user terminal; processing, by a processor of the user terminal, the
7 photographic image to extract characteristic information from the photographic image;
8 transmitting a content information request message with the extracted characteristic information
9 to a server; and receiving content information from the server in response to the content
10 information request message.
11

12 63. Defendant infringes claim 16.

13 64. Defendant, at least in internal use and testing, practices a method of providing
14 content (*e.g.*, a webpage associated with Defendant) with the use of a code pattern (*e.g.*, a QR
15 code) by a user terminal (*e.g.*, a smartphone).

16 65. Defendant, at least in internal use and testing, obtains a photographic image of a
17 code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*, smartphone).

18 66. Defendant, at least in internal use and testing, processes by a processor of the user
19 terminal (*e.g.*, smartphone), the photographic image of the code pattern (*e.g.*, QR code) to extract
20 characteristic information from the photographic image.

21 67. Defendant, at least in internal use and testing, transmits and receives a content
22 information request message (*e.g.*, http request message for accessing the webpage associated
23 with Defendant) to or from a server (*e.g.*, Defendant's server) based on the extracted
24 characteristic information (*e.g.*, URL of the webpage associated with Defendant).
25

1 68. Upon information and belief, Defendant has known of the existence of the ‘159
2 Patent, and its acts of infringement have been willful and in disregard for the ‘159 Patent,
3 without any reasonable basis for believing that it had a right to engage in the infringing conduct.

4 69. Defendant’s acts of infringement of the ‘159 Patent have caused and will continue
5 to cause Plaintiff damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. §
6 284.

7 70. Defendant’s acts of infringement of the ‘159 Patent have caused and will continue
8 to cause Plaintiff immediate and irreparable harm unless such infringing activities are also
9 enjoined by this court pursuant to 35 U.S.C. § 283. Plaintiff has no adequate remedy at law.

10 71. Upon information and belief, the ‘159 Patent, at all times material, was and is in
11 compliance with 35 U.S.C. § 287.

12 72. Plaintiff retained the law firm of WATSON LLP to represent its interests in this
13 action, and is obligated to pay such firm reasonable attorneys’ fees for its services. Plaintiff may
14 recover its attorneys’ fees and costs from Defendant, pursuant to 35 U.S.C. § 285, because this
15 case is exceptional.

16
17 **WHEREFORE**, Plaintiff, CODING TECHNOLOGIES, LLC, demands judgment
18 against Defendant, MERCEDES-BENZ USA, LLC, and respectfully seeks the entry of an order
19 (i) adjudging that Defendant has infringed the ‘159 Patent, in violation of 35 U.S.C. § 271; (ii)
20 granting an injunction enjoining Defendant, its employees, agents, officers, directors, attorneys,
21 successors, affiliates, subsidiaries and assigns, and all of those in active concert and participation
22 with any of the foregoing persons or entities from infringing, contributing to the infringement of,
23 or inducing infringement of the ‘159 Patent; (iii) ordering Defendant to account and pay damages
24 adequate to compensate Plaintiff for Defendant’s infringement of the ‘159 Patent, with pre-
25

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1 judgment and post-judgment interest and costs, pursuant to 35 U.S.C. § 284; (iv) ordering that
2 the damages award be increased up to three times the actual amount assessed, pursuant to 35
3 U.S.C. § 284; (v) declaring this case exceptional and awarding Plaintiff its reasonable attorneys'
4 fees, pursuant to 35 U.S.C. § 285; and, (vi) awarding such other and further relief as this court
5 deems just and proper.

6
7 **DATED** on October 11, 2017

8
9 Respectfully submitted,

10 /s/ Coleman W. Watson, Esq.

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